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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**MOTION FOR ENTRY OF AN ORDER
FURTHER EXTENDING DEADLINE FOR
THE REORGANIZED DEBTORS TO
OBJECT TO CLAIMS AND FOR
RELATED RELIEF**

Date: December 5, 2023
Time: 10:00 a.m. (Pacific Time)
Place: **(Telephonic or Video Only)**
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

**Objection Deadline:
November 28, 2023, 4:00 pm (Pacific Time)**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),
2 as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in
3 the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby submit this Motion (the
4 “**Motion**”), in accordance with Section 7.1 of the Plan,¹ sections 105(a) and 1142 of title 11 of the
5 United States Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of Bankruptcy
6 Procedure (the “**Bankruptcy Rules**”), for entry of an order, substantially in the form attached hereto
7 as **Exhibit A** (the “**Proposed Order**”): (i) further extending the deadline established under the Plan
8 for the Reorganized Debtors to object to General Claims (as defined below) by an additional one
9 hundred eighty (180) days, through and including June 17, 2024,² without prejudice to the
10 Reorganized Debtors’ right to seek additional extensions thereof; and (ii) granting related relief. In
11 support of the Motion, the Reorganized Debtors submit the Declaration of Robb McWilliams, filed
12 concurrently herewith.

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25 ¹ Capitalized terms used but not herein defined have the meanings ascribed to such terms in the
26 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020*
27 [Docket No. 8048] (as it may be amended, modified, or supplemented and together with any exhibits
28 or schedules thereto, the “**Plan**”).

² 180 days from the Current Objection Deadline (as defined below) is Saturday, June 15, 2024. The
next day that is not a Saturday, Sunday, or legal holiday is June 17, 2024. *See* Fed. R. Bankr. P. 9006.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. PRELIMINARY STATEMENT**

3 Approximately 15,250 General Claims³ were scheduled or filed in these Chapter 11 Cases
4 against the Debtors. The General Claims do not include the Securities Claims,⁴ or the Fire Victim
5 Claims and Subrogation Wildfire Claims, which were channeled to the Fire Victim Trust and the
6 Subrogation Trust, respectively. The Reorganized Debtors and their professionals have worked
7 diligently to resolve the General Claims, and they are nearing completion of this herculean task. In
8 the three years since the Effective Date, the Reorganized Debtors have successfully expunged
9 through objection, reduced through settlement, reconciled and allowed, or otherwise resolved over
10 15,100 of the General Claims. This represents approximately \$59.7 billion in the aggregate of the
11 approximately \$60.2 billion of General Claims filed in these Chapter 11 Cases—approximately 99%
12 of the total dollar amount and 99% of the total number of General Claims.

13 The Reorganized Debtors respectfully request that they be permitted to continue their
14 substantial efforts to reconcile and resolve General Claims and that the December 18, 2023 deadline
15 to object to Claims (the “**Current Objection Deadline**”)⁵ be extended an additional one hundred
16 eighty (180) days, through and including June 17, 2024,⁶ solely with respect to the General Claims,
17 without prejudice to the Reorganized Debtors’ right to seek additional extensions thereof. While the
18 Reorganized Debtors and their professionals have made good use of prior extensions granted by the
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³ As used herein, “**General Claims**” means Claims scheduled by or filed against the Debtors that are
21 not Securities Claims, Fire Victim Claims, or Subrogation Wildfire Claims. These General Claims
22 include, but are not limited to, trade claims, customer claims, employment claims, regulatory claims,
real property claims, and tort and other litigation claims that are unrelated to the Fires.

23 ⁴ “**Securities Claims**” means rescission or damages claims filed in the Chapter 11 Cases by claimants
24 who have asserted that they purchased or acquired certain of the Debtors’ publicly held debt and equity
25 securities during the period from April 29, 2015 through November 15, 2018, inclusive. A high-level
update on the status of the Reorganized Debtors’ efforts to resolve the remaining Securities Claims is
included in Section III(D) below.

26 ⁵ The period between June 20, 2023, the previous objection deadline, and the Current Objection
27 Deadline is the “**Sixth Extension Period**.”

28 ⁶ 180 days from the Current Objection Deadline (as defined below) is Saturday, June 15, 2024. The
next day that is not a Saturday, Sunday, or legal holiday is June 17, 2024. *See* Fed. R. Bankr. P. 9006.

1 Court, resolution of the approximately forty-two Remaining General Claims⁷ will require additional
 2 time beyond the Current Objection Deadline because the Remaining General Claims (1) are subject
 3 to ongoing settlement and business discussions; (2) depend on the conclusion of disputes proceeding
 4 in other fora; or (3) present various factual, legal, or procedural complexities.⁸

5 This Motion does not seek to modify any dates or procedures with respect to the Securities
 6 Claims. As the Court is well aware, the Reorganized Debtors have been focused on resolving and
 7 addressing the Securities Claims through the Securities ADR Procedures and the Court's
 8 Amendment and Objection Procedures, which set forth a roadmap, including deadlines, for the
 9 resolution of unresolved Securities Claims.

10 The Reorganized Debtors submit that the relief sought in this Motion will benefit all parties
 11 in interest because it will provide the Reorganized Debtors with additional time to attempt to resolve
 12 the Remaining General Claims consensually, without burdening the Court with avoidable litigation
 13 or imposing avoidable litigation-related costs and expenses on the parties. Absent the relief
 14 requested, the Reorganized Debtors may be compelled to object to the Remaining General Claims to
 15 avoid a windfall to some Claimants from the "deemed allowance" of non-meritorious Claims under
 16 the Plan.

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 18 ⁷ **"Remaining General Claims"** means the General Claims filed in these Chapter 11 cases, excluding
 19 (i) those to which the Reorganized Debtors have objected (or to which the Reorganized Debtors expect
 20 to object prior to the Current Objection Deadline), (ii) those for which the automatic stay has been
 21 lifted or the Plan Injunction modified (or as to which the Reorganized Debtors expect the Plan
 Injunction to be modified prior to Current Objection Deadline), and (iii) those that the Reorganized
 Debtors have settled or otherwise resolved on a final basis.

22 ⁸ The Remaining General Claims do not include the following: (1) the **"United States Claims,"**
 23 defined as the Class 4B Utility General Unsecured Claims of the United States identified by claim
 24 number and amount in Docket No. 13839 and (2) the **"Calpine Claims,"** defined as those asserted by
 25 Calpine Corporation (**"Calpine"**) arising from the McCabe and Sawmill Fires, as enumerated in
 26 Docket No. 13805. For the avoidance of doubt, the Motion does not seek any relief with respect to
 27 either the United States Claims or the Calpine Claims. The Reorganized Debtors and the United States
 28 have stipulated to a December 18, 2023, deadline for the Reorganized Debtors to object to the
 remaining United States Claims. The Reorganized Debtors will endeavor to stipulate with the United
 States to a further extension of this deadline. The Reorganized Debtors and Calpine have agreed that
 the deadline for the Reorganized Debtors to object to the Calpine Claims, if the parties have not
 resolved the Calpine Claims by settlement by December 1, 2023, is December 31, 2023, subject to
 further agreement of the parties.

II. JURISDICTION

This Court has jurisdiction to consider these issues pursuant to 28 U.S.C. sections 157 and 1334; the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.); and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”). This is a core proceeding pursuant to 28 U.S.C. section 157(b). Venue is proper before the Court pursuant to 28 U.S.C. sections 1408 and 1409.

III. BACKGROUND

A. The Plan and the General Claims Procedures

On January 29, 2019, the Debtors commenced voluntary cases for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of California. Prior to the Effective Date, the Debtors operated their businesses and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

On July 1, 2019, the Court entered the *Order Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and Other Information to All Creditors and Potential Creditors* [Docket No. 2806] (the “**Bar Date Order**”). The Bar Date Order set October 21, 2019 (the “**Bar Date**”) as the deadline to file proofs of claim (each, a “**Proof of Claim**”) for prepetition claims (as defined in section 101(5) of the Bankruptcy Code), including all claims of Fire Claimants, Wildfire Subrogation Claimants, Governmental Units, customers, secured claims and priority claims against either of the Debtors.⁹

⁹ The Bar Date was later extended to December 31, 2019, solely with respect to unfiled, non-governmental Fire Claims [Docket No. 4672]; and separately to April 16, 2020, solely with respect to persons or entities that purchased or acquired certain of the Debtors’ publicly held debt and equity securities within the limited period from April 29, 2015 through November 15, 2018, inclusive, and that may have Securities Claims based on those purchases against the Debtors [Docket No. 5943].

On June 20, 2020, this Court entered the Order confirming the Plan [Docket No. 8053] (the “**Confirmation Order**”). The Plan became effective on July 1, 2020 [Docket No. 8252] (the “**Effective Date**”). Pursuant to Section 7.1 of the Plan (as approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to Claims until the later of (i) one-hundred and eighty (180) days after the Effective Date (*i.e.*, December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause shown. Plan § 7.1.

On June 30, 2020, the Court entered the *Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections* [Docket No. 8228] (the “**General Claims Omnibus Objection Procedures Order**,” and each objection filed pursuant thereto, a “**General Claim Omnibus Objection**”), which permits the Reorganized Debtors to file objections to General Claims on an omnibus basis.

On September 25, 2020, the Court entered the *Order Approving ADR and Related Procedures for Resolving General Claims* [Docket No. 9148] (the “**General Claims ADR Procedures Order**”). The General Claims ADR Procedures Order approved “**General Claims Procedures**” (as defined therein) that allow: (i) General Claimants (*i.e.*, holders of Claims other than Fire Victim Claims, Subrogation Wildfire Claims, or Securities Claims) to submit, by mail or via a secure online portal, information necessary to allow the Reorganized Debtors to evaluate their Claims and develop settlement proposals; and (ii) the parties to exchange settlement offers or engage in standard or abbreviated forms of mediation to resolve General Claims. The General Claims Procedures were designed to work together with the procedures set forth in the General Claims Omnibus Objection Procedures Order to form a comprehensive and efficient pre-litigation approach to resolving General Claims.

B. The Reorganized Debtors’ Successful General Claims Reconciliation Progress

The resolution of General Claims has required extensive efforts by the Reorganized Debtors’ team of advisors, attorneys, and personnel. As more fully set forth below, since the Effective Date, the Reorganized Debtors have successfully expunged through objection, reduced through settlement, reconciled and allowed, or otherwise resolved approximately 99% of the total dollar amount of General Claims asserted in these Chapter 11 Cases.

1 General Claim Omnibus Objections. As of the date hereof, the Reorganized Debtors have filed
2 120 General Claim Omnibus Objections, which has led to the resolution of over 9,520 General Claims
3 through modification, withdrawal, disallowance and/or expungement. This has reduced the amounts
4 asserted against the Debtors by approximately \$31.6 billion. The Reorganized Debtors filed the One
5 Hundred Twentieth Omnibus Objection during the Sixth Extension Period.

6 Settled Claims. The Reorganized Debtors have undertaken extensive efforts to resolve many
7 of the General Claims through negotiated settlements, including through the General Claims
8 Procedures further described below. These negotiation efforts have led to the settlement of
9 approximately 2,370 General Claims, totaling over \$5.6 billion in asserted claim amounts (plus
10 unliquidated amounts), both within and separate from the General Claims Procedures discussed below.
11 The Reorganized Debtors settled eleven of those General Claims during the Sixth Extension Period.

12 General Claims Procedures. The Reorganized Debtors have resolved a subset of the settled
13 General Claims described above through the General Claims Procedures. Since the entry of the
14 General Claims ADR Procedures Order, the Reorganized Debtors have sent formal information
15 requests to the holders of over 410 General Claims, have initiated settlement offer exchanges on
16 approximately 150 General Claims, and have noticed over ninety Abbreviated Mediations and over
17 seventy Standard Mediations (each as defined in the General Claims ADR Procedures Order).¹⁰ The
18 General Claims Procedures have resulted in the resolution of approximately 150 General Claims by
19 settlement, totaling approximately \$210 million in asserted value (plus unliquidated amounts).

20 Claims Litigated Outside of Bankruptcy Court. As of the date of this Motion, thirty-three
21 General Claims are being litigated in non-bankruptcy fora pursuant to orders of the Court modifying
22 the automatic stay or Plan Injunction. Under the *Order Further Extending Deadline for the*
23 *Reorganized Debtors to Object to Claims and for Related Relief* [Docket No. 11533], such Claims
24 are deemed to have been objected to for purposes of the Plan's definition of "Allowed."
25 Plan § 1.7(f).

26 _____
27 ¹⁰ The categories referenced in this sentence are not mutually exclusive; for example, the Reorganized
28 Debtors may have sent an information request, initiated settlement offer exchanges, and noticed a
mediation on the same General Claim.

1 Distributions on Claims. Since the Effective Date, the Reorganized Debtors have processed
2 more than 102 rounds of distributions and made distributions on approximately 5,150 General
3 Claims, totaling approximately \$24.6 billion.

4 **C. Previous Extension Motions**

5 As is typical in large Chapter 11 cases with complicated and numerous claims, the Court has
6 extended the Reorganized Debtors' deadline to object to claims under Section 7.1 of the Plan several
7 times. The Reorganized Debtors' first such motion was made on October 27, 2020 [Docket No.
8 9355], which the Court granted, with some limited modifications, on November 17, 2020. [Docket
9 No. 9563]. Most recently, the Court granted a sixth motion to extend the objection deadline [Docket
10 No. 13745], which order [Docket No. 13849] (the "**Sixth Extension Order**") set the Current
11 Objection Deadline.

12 **D. The Securities ADR Procedures Continue to Work with Respect to the**
13 **Resolution of the Securities Claims, Which Are Not the Subject of this Motion**

14 The Court-ordered *Securities ADR and Related Procedures for Resolving Subordinated*
15 *Claims* (the "**Securities ADR Procedures**"), which were attached as Exhibit A to the *Order*
16 *Approving Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
17 [Dkt. No. 10015] (the "**Securities ADR Procedures Order**") and the related *Order Authorizing*
18 *Amendment and Objection Procedures for Securities Claims* [Dkt. No. 13934] (the "**Amendment**
19 **and Objection Procedures**"), have continued to work to resolve Securities Claims. The
20 Reorganized Debtors have now resolved over 76% of all Securities Claims; of the 8,975 Securities
21 Claims (which includes amendments as separate Securities Claims until the prior claim is expunged
22 as a duplicate), nearly 6,850 have now been resolved, including more than 4,200 claims resolved by
23 settlement. Settlements have been consummated with small and large claimants, including several
24 sophisticated institutions and funds, often represented by counsel (some of whom have appeared
25 before the Court). The unsupported narrative by some that settlements have only been with small
26 claimants is just wrong. Excluding claimants represented by Rolnick Kramer Sadighi LLP ("**RKS**"),
27 the Reorganized Debtors have settled with fourteen of the twenty-five claimants that have the largest
28 claims.

As of November 13, 2023, there are only approximately 2,100 Securities Claims that remain unresolved, and even that number understates PG&E's substantial progress in resolving the Securities Claims. Of the approximately 2,100 unresolved Securities Claims, approximately 760 are claims represented by RKS and another approximately 200 claims have been filed by Vanguard or its affiliates. In other words, RKS and Vanguard alone account for approximately 45% of the unresolved Securities Claims. Thus, there are now only about 1,160 unresolved Securities Claims outside of those represented by RKS or filed by Vanguard. Because many claimants or affiliated groups of claimants often filed multiple proofs of claim, these approximately 1,160 proofs of claims represent only approximately 600 unique filers of proofs of claims—and the Reorganized Debtors expect that this number will continue to be significantly reduced by omnibus objections and settlements in the coming months.

Pursuant to the Amendment and Objection Procedures, the deadline by which the Reorganized Debtors must object to any unresolved Securities Claims is December 13, 2023, which deadline, for all but a small number of holders of Securities Claims, is subject to applicable tolling provisions of the Securities ADR Procedures that extend such time. This Motion does not seek any relief with respect to the deadlines applicable to the Securities Claims.

E. The Remaining General Claims

The approximately forty-two Remaining General Claims fall into three general buckets. First, certain Claims are subject to active settlement negotiations and/or business discussions. Of these, the Reorganized Debtors have extended settlement offers to resolve six General Claims; if accepted, these settlements will reduce the unresolved asserted Claims pool by approximately \$14.3 million. The Reorganized Debtors also are awaiting final documentation of a settlement with respect to one General Claim. Second, certain of the General Claims do not require any immediate action by the Reorganized Debtors, but cannot be resolved until the conclusion of certain disputes pending in other fora, including because the vast majority are indemnification/subrogation Claims that necessarily trail other matters. The remaining few General Claims present complicated legal, factual, or procedural issues that the Reorganized Debtors require more time to analyze in order to determine the best path to resolution.

IV. BASIS FOR RELIEF REQUESTED

A. The Court Has the Authority to Extend the Current Objection Deadline

The Court has the express authority to extend the Current Objection Deadline, and cause exists for it to do so. Section 7.1 of the Plan (as approved by Paragraph 31 of the Confirmation Order) provides that the Current Objection Deadline may be extended by the Court for cause shown. Plan § 7.1. This provision anticipates and provides the necessary authority for the Motion.

Even in the absence of express authority, Bankruptcy Rule 9006(b) provides in relevant part that “when an act is required or allowed to be done at or within a specified period . . . by order of [the] court, the court for cause shown may at any time in its discretion . . . order the period enlarged” Fed. R. Bankr. P. 9006(b). The Plan and Confirmation Order provide that the Court retains jurisdiction over “all matters arising under, arising out of, or related to the Chapter 11 Cases and the Plan pursuant to, and for the purposes of, sections 105(a) and 1142 of the Bankruptcy Code.” Confirmation Order ¶ 78; Plan § 11.1. Finally, the Plan also provides that the Court retains jurisdiction for, *inter alia*, the following purposes:

(d) To consider Claims or the allowance, classification, priority, compromise, estimation, or payment of any Claim, including any Administrative Expense Claims; ...[and]

(k) To take any action and issue such orders as may be necessary to construe, enforce, implement, execute, and consummate the Plan or to maintain the integrity of the Plan following consummation[.]

Plan § 11.1(d) and (k). These provisions underscore the Court’s authority to extend the Current Objection Deadline.

Indeed, the Plan’s express authority to extend the Current Objection Deadline is consistent with the Court’s general authority under sections 105(a) and 1142(b) of the Bankruptcy Code to issue orders necessary for the consummation of the Plan or to carry out the provisions of the Bankruptcy Code. *See* 11 U.S.C. § 105(a) (“The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].”); 11 U.S.C. § 1142(b) (“The court may direct the debtor . . . to perform any other act . . . that is necessary for the consummation of the plan.”); *see also Adelphia Bus. Solutions, Inc. v. Abnos*, 482 F.3d 602, 609 (2d Cir. 2007) (“Section 105(a) grants broad equitable power to the bankruptcy courts

to carry out the provisions of the Bankruptcy Code so long as that power is exercised within the confines of the Bankruptcy Code.”); *Nobel Grp., Inc. v. Bank (In re Nobel Grp., Inc.)*, 529 B.R. 284, 290-91 (Bankr. N.D. Cal. 2015) (quoting *Binder v. Price Waterhouse & Co., LLP (In re Resorts Int’l, Inc.)*, 372 F.3d 154, 165 (3d Cir. 2004) (“Post-confirmation jurisdiction is assumed by statute and rule: 11 U.S.C. § 1142(b) authorizes the bankruptcy court to ‘direct’ the debtor and any other necessary party . . . to perform any other act . . . that is necessary for the consummation of the plan.”)).

Finally, the Court has the inherent power “‘to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.’” *Dependable Highway Express, Inc. v. Navigators Ins. Co.*, 498 F.3d 1059, 1066 (9th Cir. 2007) (quoting *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936)). Further extension of the Current Objection Deadline is in line with relief granted in chapter 11 cases of similar size. *See, e.g., In re Lehman Brothers Holdings Inc.*, Case No. 08-13555 (Bankr. S.D.N.Y. Sept. 15, 2008), Docket Nos. 58842, 54122, 50165, 41286 (extending claims objection deadline four times, for a total of six years); *In re Motors Liquidation Corp.*, Case No. 09-50026 (Bankr. S.D.N.Y. June 1, 2009), Docket Nos. 10938, 11546, 12092, 12364, 12499, 12610 (extending claims objection deadline six times, for a total of nearly three years); *In re MF Global Holdings Ltd., et al.*, Case No. 11-15059 (Bankr. S.D.N.Y. Oct. 31, 2011), Docket Nos. 2290, 2247, 2200, 2160, 2102, 2028, 1869 (extending claims objection deadline seven times, for a total of two and a half years).

B. Good Cause Exists to Extend the Current Objection Deadline

As more fully set forth above, the Reorganized Debtors have acted diligently to review and resolve the immense number of General Claims asserted in these Chapter 11 Cases. To date, the Reorganized Debtors have resolved over 15,100 General Claims with asserted amounts of \$59.7 billion, representing approximately 99% of the aggregate dollar amount of Claims asserted in these Chapter 11 Cases. The Reorganized Debtors believe that the requested extension of 180 days is required and reasonable in light of the nature of the Remaining General Claims, but submit that additional time may be necessary to resolve certain Claims.

Extension of the Current Objection Deadline will benefit the estates as a whole, including creditors and other parties in interest. It will enable the Reorganized Debtors to continue to engage

1 in meaningful negotiations to resolve Claims consensually, minimizing the need to file and litigate
2 objections. Resolving a Claim without a formal objection benefits both the holder of the Claim and
3 the Reorganized Debtors' other stakeholders by avoiding the burden and expense of litigation.
4 Further, if the Current Objection Deadline is not extended, the Reorganized Debtors will be
5 compelled to divert their resources to supplement any pending objections to the Remaining General
6 Claims and file new objections to those Remaining General Claims for which no objection has been
7 filed. If the requested relief were not granted, the Reorganized Debtors would be forced to either
8 (a) forego filing meritorious objections, thus creating a windfall for some holders of the Remaining
9 General Claims, *or* (b) file a plethora of rushed, expansive prophylactic objections to meet the
10 Current Objection Deadline and preserve the Reorganized Debtors' rights, which would be
11 inefficient and impose substantial burdens on the Court and the Reorganized Debtors and significant
12 inconvenience and litigation expense on holders of the Remaining General Claims. Neither of these
13 alternatives would be in the best interests of the Reorganized Debtors' stakeholders, notably
14 including the Fire Victims Trust—which holds a significant stake in the Reorganized Debtors'
15 equity—and the holders of Fire Victim Claims who are that Trust's beneficiaries.

16 Extending the Current Objection Deadline will not prejudice holders of the Remaining
17 General Claims for the reasons stated above, and because such an extension is contemplated by the
18 Plan and is reasonable under the circumstances. Moreover, whether or not the Current Objection
19 Deadline is extended, holders of the Remaining General Claims will have a full and fair opportunity
20 to be heard if and when an objection is litigated.

21 For these reasons, the Reorganized Debtors submit that extending the Current Objection
22 Deadline through and including June 17, 2024, without prejudice to the Reorganized Debtors' right
23 to seek additional extensions thereof, is appropriate under the circumstances.

24 **V. NOTICE**

25 Notice of this Motion will be provided to: (i) the Office of the U.S. Trustee for Region 17
26 (Attn: Andrew R. Vara, Esq. and Timothy Laffredi, Esq.); (ii) all counsel and parties receiving
27 electronic notice through the Court's electronic case filing system; and (iii) those persons who have
28 formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002.

1 The Reorganized Debtors respectfully submit that no further notice is required. No previous request
2 for the relief sought herein has been made by the Reorganized Debtors to this or any other Court.

3 WHEREFORE the Reorganized Debtors respectfully request entry of the Proposed Order
4 granting (i) the relief requested herein, and (ii) such other and further relief for the Reorganized
5 Debtors as the Court may deem just and appropriate.

6 Dated: November 14, 2023

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

/s/ Dara L. Silveira

Dara L. Silveira

*Attorneys for the Debtors and Reorganized
Debtors*